

Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

F.L.B., a minor, by and through his Next Friend,
Casey Trupin, et al.,

Plaintiffs-Petitioners,

v.

Loretta E. LYNCH, Attorney General, United
States, et al.,

Defendants-Respondents.

Case No. 2:14-cv-01026-TSZ

**DECLARATION OF KRISTIN
MACLEOD-BALL IN SUPPORT
OF PLAINTIFFS' MOTION TO
REMOVE KATHERINE
PEGUERO AND APPOINT
INGRID PEREZ AS NEXT
FRIEND TO J.R.A.P.**

1 I, Kristin Macleod-Ball, declare and state as follows:

- 2 1. I submit this declaration in support of Plaintiffs' Motion to Remove Katherine Peguero and
3 Appoint Ingrid Perez as Next Friend to J.R.A.P. I have personal knowledge of the facts set
4 forth herein, and, if called as a witness, I could and would testify competently as set forth
5 below.
- 6 2. I am a Staff Attorney at the American Immigration Council, and am among the counsel for
7 Plaintiffs in this case.
- 8 3. Following receipt of Defendants' Notice of Deposition of Plaintiff J.R.A.P.'s Next Friend
9 Katherine Peguero, I called Katherine Peguero with the assistance of an interpreter. On
10 June 23, 2016, I confirmed that Ms. Peguero would be able to attend a deposition in Miami,
11 on July 12, 2016 at 9 am. Subsequently, I was in contact with Ms. Peguero to prepare for
12 her deposition, including on July 11.
- 13 4. On July 12, prior to 9 am, I attempted to contact Ms. Peguero by telephone and text
14 message. I was unable to reach Ms. Peguero.
- 15 5. On July 12 at 9 am, Ms. Peguero did not appear for her deposition. Subsequently, I
16 travelled to the home where I believe Ms. Peguero had been staying, but no one appeared to
17 be at home. I continued to try to reach Ms. Peguero by telephone and text message.
- 18 6. On July 12 at approximately 11 am, I reached Ms. Peguero by telephone with the assistance
19 of an interpreter. She stated that she was at a hospital with a family member and was not
20 able to leave. Shortly afterwards, the call was disconnected. Subsequently, I was unable to
21 reach Ms. Peguero by telephone.
- 22 7. On July 13, 14, 15 and 18, I attempted to reach Ms. Peguero by telephone, but did not
23 succeed.
- 24 8. On July 18, I spoke to Ingrid Perez by telephone with the assistance of an interpreter. She
25 confirmed that she would be available for a deposition in Miami on July 22, 2016, which
26 Defendants intend to take at 9 am on that date.

1 9. On July 19, I reached Ms. Peguero by telephone. I spoke to Ms. Peguero briefly with the
2 assistance of an interpreter, but shortly after the call began, it was disconnected. I called
3 Ms. Peguero again and spoke to her briefly a second time before the call was disconnected
4 again. Subsequently, I was unable to reach Ms. Peguero by telephone.

5 I declare under penalty of perjury of the laws of the United States that the foregoing is true and
6 correct to the best of my knowledge and belief.

7
8 Executed this 20th day of July, 2016, in Washington, DC.

9 s/Kristin Macleod-Ball

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KRISTIN MACLEOD-BALL

